

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Third Periodic Review of the) MB Docket 07-91
Commission's Rules and Policies)
Affecting the Conversion)
To Digital Television)

To: The Commission

COMMENTS OF SCRIPPS HOWARD BROADCASTING COMPANY

Scripps Howard Broadcasting Company, licensee of ten major market television stations, through counsel, submits as comments the attached Engineering Statement prepared by John F.X. Browne in response to the Federal Communications Commission's Notice of Proposed Rulemaking for the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91.

Respectfully submitted,

SCRIPPS HOWARD BROADCASTING COMPANY

By: Kenneth C. Howard, Jr. / yb
Kenneth C. Howard, Jr.,
Its Attorney

August 15, 2007



Engineering Statement
John F.X. Browne
regarding
Comments of Scripps Howard Broadcasting
in the matter of
Third Periodic Review of the
Commissions Rules and Policies Affecting the
Conversion to Digital Television

Scripps Howard Broadcasting (Scripps) is the licensee of ten major market television broadcast stations. Scripps has been diligently pursuing the conversion to digital operation at all of its facilities, most of which already cover more than 95% of the populations in the certified coverage areas of those stations.

In several markets, Scripps finds itself in difficult situations typically because present DTV antennas are side-mounted and will be replaced by new top-mounted digital antennas once the analog antennas are removed. In cases where it has standby analog antennas, the service rendered by those antennas is typically sub-par (due to side-mounting, low elevation and or low ERP) as these antennas were intended for very short term emergency use. Scripps believes that it must maintain its full analog service as long as possible in order to reach the majority of its viewers. This prevents an early removal of the top analog antenna for replacement by the new digital antenna.

In two cases, Scripps shares its tower with another licensee and the coordination of two stations attempting to install new DTV antennas while maintaining analog service is particularly vexing.



One case presents a good example of the practical issues facing Scripps.

At WEWS, Cleveland, OH the present antenna configuration involves stacked VHF analog and UHF digital antennas on top of the tower. In order to comply with its certified/TCD coverage requirements, the digital antenna must be replaced. This means that both top mounted antennas must be removed; absent auxiliary antennas this, of course, would mean that both analog and digital stations would be off-the-air. WEWS presently has no auxiliary DTV antenna and its analog auxiliary antenna is sited on a nearby tower at a very low elevation; the analog auxiliary facility provides very poor coverage of the market. Thus, Scripps intends on removing its main analog antenna and side mounting it to maintain some semblance of service during the transition. It would like to install a temporary digital antenna (side-mounted) to continue to provide DTV service during the re-construction but it is now doubtful that the tower has sufficient structural capacity to support all of the antennas and construction rigging. Thus, it may be necessary to remove the auxiliary analog antenna (on a separate tower) and re-install the digital antenna removed from the main tower on the auxiliary tower. Once the main tower top is cleared, some structural modifications will be necessary to accommodate the new digital antenna. Given this scenario, it is clear that both analog and digital service will suffer during the changeover which will probably take a month to accomplish barring weather delays.

Weather in Cleveland is a major deterrent to attempting to perform any major tower work between October and April. Starting this work in the summer of 2008 would mean that the WEWS analog service would be seriously compromised for at least six months, and unacceptable situation from a market standpoint.

If Scripps had six months after the transition date to install its final DTV facilities, the conversion would be greatly simplified as it would not have to install and maintain temporary analog facilities.

Scripps believes that the mandate to terminate analog service by February 17, 2009 should not be tied to what should be a separate mandate to complete final DTV facilities by a

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date-certain. Therefore, Scripps requests that stations be allowed at least six months after the "hard date" to complete their digital facilities so that the transition can be made in an orderly and cost effective manner.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.
August 14, 2007